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HOUSTON DIVISION

CRIMINAL DOCKET

United States Courts  
Southern District of Texas  
FILED

April 30, 2024

No. **4:24-cr-00224**

USAO Number:

Magistrate Number:

CRIMINAL INDICTMENT

Filed Nathan Ochsner, Clerk of Court Judge:

**Bennett**

UNITED STATES of AMERICA

VS.

ATTORNEYS:

NICOLE ARGIENTIERI, US DOJ CRIM,  
MATTHEW OLSON, US DOJ NSD

Marco Palmieri, Rosaleen O'Gara, Celia Choy, (202) 307-1475  
Garrett Coyle, DOJ Trial

ENRIQUE ROBERTO "HENRY" CUELLAR (1-14)

CHRIS FLOOD

Appt'd  
☐

Private  
☒

and

IMELDA RIOS CUELLAR (1-14)

DEREK HOLLINGSWORTH

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CHARGE: Cts. 1 & 5: Conspiracy [18 USC 371]

(TOTAL)  
(COUNTS:) Cts. 2 & 6: Bribery [18 USC 201]

( 14 ) Cts. 3 & 7: Honest Services Wire Fraud [18 USC 1349]

Cts. 4 & 8: Public Official Acting as an Agent of a Foreign Principal [18 USC 219]

Ct. 9: Money Laundering Conspiracy [18 USC 1956(h)]

Cts. 10-14: Money Laundering [18 USC 1956(a)(1)(B)(i)]

PENALTY:

Cts. 1 & 5: 5 years imprisonment; up to \$250,000 fine or twice the pecuniary gain or loss; supervised release term of up to 3 years; \$100 special assessment

Cts. 2 & 6: 15 years imprisonment; up to \$250,000 fine or three times the amount of the thing of value; supervised release term up to 3 years; \$100 special assessment

Cts. 3 & 7: 20 years imprisonment; up to \$250,000 fine or twice the pecuniary gain or loss; supervised release term up to 3 years; \$100 special assessment

Cts. 4 & 8: 2 years imprisonment; up to \$250,000 fine; or twice the pecuniary gain or loss supervised release term up to 1 year; \$100 special assessment

Ct. 9: Up to 20 years imprisonment; up to \$500,000 fine or twice the amount of funds laundered; supervised release up to 3 years; \$100 special assessment

Cts. 10-14: 20 years imprisonment; up to \$500,000 fine or twice the amount of funds laundered; supervised release up to 3 years; \$100 special assessment

In Jail

On Bond

No Arrest

NAME & ADDRESS of  
Surety:

PROCEEDINGS: